Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Cellular Priority Access for	)	WT Docket No. 96-86
National Security and Emergency	)	
Preparedness Telecommunications	)	
as Proposed by the National	)	
Communications System	)	

COMMENTS BY WASHINGTON STATE EMERGENCY MANAGEMENT

Background

Washington State Emergency Management as a public agency specifically directed to assist and coordinate with emergency responders in planning for, mitigating potential affects of, responding to and recovering from declared disasters has a critical interest in, and a demonstrated need for ready access to wireless network services.

General

The "cellular priority access" proposal as developed by the National Communications System (NCS) and submitted in the petition for rulemaking filed with the Commission addresses an issue critical to effective coordination of response to extra-ordinary emergency situations. Experience has demonstrated that the wireless networks quickly become congested, blocking their use by responding agencies. The proposal would not only make those networks useable for coordinating between agencies, but also contains provisions that would allow the inclusion of critical private resource suppliers under the sponsorship of the public agencies they support.

Effect On Spectrum Needs

The relationship to private service suppliers demonstrates how this CPAS proposal is related to, but independent of, other communications needs of public agencies including the need for additional spectrum also under review by the Commission. Radio communications is a tool for incident command to coordinate actions among responders, and for communication within the responding task force. It is limited to those who have radio instruments and to the system capacity, which is generally able to handle only an incremental additional number of coordinated command groups. In trunked radio systems this is accomplished by means of talk groups and there is considerable flexibility in group assignment. However, it is still limited to the available resource of radio units. Public switched networks are the key element to providing communications access outside the responder groups, and between groups when non-interoperability or similar deficiencies limit the usefulness of the radio systems.

The advent of wireless public access telephone systems has allowed the moving of private resource acquisition requests to the incident command location and provides for direct coordination of private resource delivery from the field. These private resources are not participants in public radio systems. Access to them is through the public telephone networks, wireline and wireless. Utilizing a public service radio system for that access results in either inefficient use of spectrum that could better be utilized to support responders and/or inefficient use of a very limited fixed base personnel resource to relay messages between the field units and the private responders.

In the early response stages of a disaster communication is limited to what is already in place. Given that a large number of public agencies utilize public

access wireless systems on a daily basis, this has become a readily available communications resource that to a large degree is pre-assigned and already in the field. On a daily basis it is utilized for communications that do not justify the investment in radio systems or are primarily with individuals outside the public organization. Many of the individuals who use these wireless telephones as part of their daily business are only assigned response related duties when the emergency exceeds the normally available resources. When that happens the nature of the emergency typically causes disruption to the public in some manner that leads to the congestion of the public switched networks. This is exactly at the point where communications with these individuals is necessary to allow them to supplement the responding units. It is particularly endemic to wireless systems where emergency incidents frequently cause roadway congestion which then generates a localized congestion within the wireless public network.

When considering the impact on the review of future public safety communications it should be recognized that many of the functions that will benefit from CPAS are traditionally not considered public safety first responders. If they were included in the formula, the need for additional spectrum would grow substantially. Illustrative examples are units from health departments and ecology departments that respond as expert advisors to hazardous spill incidents. Publicly available wireless communications is an extremely valuable tool for coordinating these resources, and tasking the associated private resources they bring to bear in reaction to an incident. The NCS CPAS proposal would directly address that situation and is clearly in the interest of allowing improved response capabilities without generating an additional spectrum need not previously considered.

Enhanced 9-1-1 Support

The enhanced 911 system utilizes wireless transmission as a backup for critical elements of that system with emphasis on those situations where call path diversity cannot be achieved through the wireline network. CPAS will potentially assure a much greater reliability in these backup links.

Summary

Washington State Emergency Management supports the petition by the NCS for CPAS and encourages rapid implementation both to allow emergency responders to fully utilize the available wireless networks and to allow those currently implementing networks to include CPAS into their network protocols during the design stages.

Respectfully submitted,

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